

Interview with River City and NRC 2/24/14

0945

Chris Whitehead (CW) back on-site; NRC on-site [consisting of] Harvey Quaife (HQ), Field Manager NRC and Bob Ransdell (BR) PM NRC, conference w/ OSC Dan Heister (DH) underway. OSC DH states Jonathan Sheckard (JS) of RCE and he had discussed site decon of equipment on 1/11-12. At that time, NRC had not yet been on-site; NRC arrived after OSC DH contacted EPA attorney requesting HazMat expertise. [HazMat expertise determined because] On-site subcontractors noted material dripping from pipes but told OSC DH piping had been rinsed. NRC equipped subs w/ Level D PPE. OSC DH requested from HQ any and all communication to sub and RCE. PM BR stated all caustic and acrylonitrile (AN) were flushed with caveat that complete dismantling of piping did not occur. OSC DH requests [NRC provide] documentation of rinsate volumes on casutics [system, but] not AN [system]; BR states that piping which had been removed were [later] found reassembled after NRC left site but before recycler had arrived on-site. No one knows who reassembled the connections.

DH asked BR if the pipes had been drained and rinsed how could they contain liquid ranging from a pH of 2.5-13? BR responded that he considered those levels to be rinsate and pure product to be pH 0 for the acid and pH 14 for the base. He proposed that when they rinse the pipes in November and December that the rinse water did produce a neutral reading, however when the residual rinse collected in the pipes a "tea bag" effect occurred over a two month period and salts from the acid and based compounds leached into it accounting for the high and low readings at the time of scrapping.

OSC DH asks BR appropriate PPE for wastes at pH = 2.5 or pH = 13 (levels found in two waste collection vessels used by NRC). BR states modified Level C is ideal and [that these are] not considered RCRA or DOT HazWaste. BR stated appropriate disposal would occur [and should] not go down the drain. DH confirmed that a respirator would be used and BR said yes. Contractors for Cascade Metals were in level D and had no hazwoper training and could not legally use a respirator.

OSC DH stated a release was made by NRC to drainage then individual performing this action decided it was not appropriate so closed [the valve] then reopened it later. BR stated this release was notified to him and [the reason was because] initially pH was believed high but later tank to valve was pH 'ed and determined to be rainwater.

OSC DH states NRC Rep Mike Cunningham (MC) used terminology of "Hot Product" discussing process equipment to sub Cascade Metals. BR states this was a misstatement on NRC's part.

1030

OSC DH concludes meeting due to conference call but requested [work] plan be devised by NRC/RCE. BR states he will prepare summary of actions to date and will determine future actions based on this.

1110

OSC DH concludes phone conference. Returns with NRC and RCE. BR presents three general options either remove items at this time with [1]) no further action, [2]) check existing piping on representative basis, [3]) or full decon [or remaining piping]. Representative basis sampling may be preferred option.

1130

Meeting concludes with NRC/RCE site walk.

1215

DH caught up with NRC and RCE. BR asked to use some pH paper on the drum of material collected during the scrapping operations and which EPA had sampled on 2/21/14. DH allowed the test. The pH paper read between pH 13 and 14.